



FRANKEL & NEWFIELD, P.C.

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July 30, 2013

VIA EMAIL ONLY

Hon. Judge Paul A. Engelmayer
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

Re: Pamela Hondros v. Metropolitan Life Insurance Company-13 CV 00384
REQUEST FOR EXTENSION OF TIME TO COMPELTE DISCOVERY

Dear Judge Engelmayer,

We are the attorneys for Plaintiff, Pamela Hondros in the above referenced action.

With the consent of the Defendant, we write to request a 60 day extension for completion of fact discovery until October 11, 2013.

By way of background, the parties conducted the Initial Conference with your Honor on April 10, 2013. Since that date, the Plaintiff received the Defendant's Initial Disclosures on April 24, 2013 and served discovery demands (depositions, interrogatories and document demands) on May 14, 2013. After a request for an extension from the Defendant, responses were served on July 12, 2013 and received on July 16, 2013.

While the parties were engaged in discovery, the parties conducted three telephonic conference calls with Magistrate Judge Freeman (June 24, 2013, July 9, 2013 and July 29, 2013) regarding possible settlement and issues concerning the valuation of the case and thereafter resolution discussions. To date, Plaintiff continues to await a substantive response from the Defendant as to the valuation of the case's exposure, to allow for the commencement of resolution discussions.

This is Plaintiff's first request for an extension of any time frames.

Thank you for your attention to this matter.

7/31/13
Granted. The parties should not expect further extensions. The September 12, 2013 conference is adjourned until November 8, 2013, at 9:30 a.m.

SO ORDERED:

Respectfully submitted,

FRANKEL & NEWFIELD, P.C.

By:
Justin Frankel (JF-5983)

JCF:jpm

HON. PAUL A. ENGELMAYER
UNITED STATES DISTRICT JUDGE